

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

RASHID JAHM,

Plaintiff,

No. 1:05-CV-11638-JLT

v

MICHIGAN STATE, STATE OF MICHIGAN,  
DENNIS D. LEIBER, MARY KELLY,  
JENNIFER M. GRANHOLM, PAUL J.  
FISCHER, CRAIG NOLAND, KEMPER  
INSURANCE PRESIDENT CLAIM  
DEPARTMENT, CATHERINE GARCIA-  
LINDSTROM, GEORGE S. BUTH, SHAWN  
M. BREIMAYER, STEPHEN C.  
BRANDSDORFER, STEVEN C. COUCH,  
GEORGE L. McGARGER and MIDWEST  
CLAIMS SERVICES,

Defendants.

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Rashid Jahm  
In *ProPer*  
49 Halleman Avenue  
Lawrence MA 01841  
(617) 780-1704

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Mark E. Donnelly (P39281)  
Attorney for Defendants State of Michigan,  
Governor Jennifer M. Granholm, Paul J. Fischer  
and the Michigan Judicial Tenure Commission  
Michigan Department of Attorney General  
Public Employment, Elections & Tort Division  
P.O. Box 30736  
Lansing, MI 48909  
(517) 373-6434

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**MOTION TO APPEAR PRO HAC VICE**

NOW COMES the Attorney General for the Commonwealth of Massachusetts pursuant to Local Rule 83.5.3(b) of the United States District Court for the District of Massachusetts, and

moves this Court to allow Mark E. Donnelly, Assistant Attorney General for the State of Michigan, to appear as counsel of record in the above-entitled cause and participate pro hac vice on behalf of Defendants State of Michigan, Michigan Governor Jennifer M. Granholm, Paul J. Fischer and the Michigan Judicial Tenure Commission (“Michigan State Defendants”), and in support thereof states and certifies to the Court:

- That Mark E. Donnelly is an assistant attorney general for the State of Michigan.
- That Mark E. Donnelly is an attorney licensed to practice law in the State of Michigan.
- That Mark E. Donnelly is a member of good standing in the State Bar of Michigan.
- That there are no disciplinary proceedings pending against Mark E. Donnelly in the State Bar of Michigan.
- Attached to this motion is a Certificate of Good Standing for Mark E. Donnelly issued by the State Bar of Michigan.
- That Mark E. Donnelly is admitted to practice in the Michigan Supreme Court, the United States District Courts for the Eastern and Western Districts of Michigan, and the Sixth Circuit Court of Appeals
- That Mark E. Donnelly is familiar with the Local Rules of the United States District Court for the District of Massachusetts.
- That a \$50.00 motion fee has been sent to the United States District Court for the District of Massachusetts under separate cover letter.
- In accordance with LR 83.5.3(b), the undersigned Assistant Attorney General will likewise enter an appearance for the Michigan State Defendants.

**THEREFORE**, Attorney General Thomas F. Reilly respectfully requests permission for Mark E. Donnelly to appear as counsel of record on behalf of Defendants State of Michigan, Michigan Governor Jennifer M. Granholm, Paul J. Fischer and the Michigan Judicial Tenure Commission, and to participate pro hac vice before the United States District Court for Massachusetts.

THOMAS F. REILLY  
ATTORNEY GENERAL

s/Juliana deHaan Rice  
Juliana deHaan Rice, BBO 564918  
Assistant Attorney General  
Office of the Attorney General  
One Ashburton Place - Room 2019  
Boston, MA 02108  
(617) 727-2200, ext. 2062

Dated: January 5, 2006

Statement of Compliance with Local Rule 7.1(A)(2)

The undersigned counsel hereby certifies that, on January 4, 2006 I attempted to reach the plaintiff *pro se* Rashid Jahm by telephone at 617-780-1704. The person answering the phone stated that he did not know Rashid Jahm. The telephone number called was the same phone number supplied by the plaintiff on the complaint he filed in this court.

s/ Mark E. Donnelly  
Mark E. Donnelly (P39281)  
Assistant Attorney General  
Michigan Department of Attorney General  
P.O. Box 30736  
Lansing, MI 48909  
(517) 373-6434

Certificate of Service

I, Juliana deHaan Rice, Assistant Attorney General, hereby certify that I have on this day served the above document upon all parties by electronic notice to ECF registered parties and by mailing a copy first class, postage prepaid to: Rashid Jahm, pro se, 49 Halleman Avenue, Lawrence, MA 01841.

/s Juliana deHaan Rice  
Juliana deHaan Rice  
Assistant Attorney General

Date: January 5, 2006



# State Bar of Michigan

## Certificate of Good Standing



This certifies that Mark E. Donnelly, P39281 of Lansing, Michigan is an active member of the State Bar of Michigan in good standing. He was admitted to practice in Michigan on November 21, 1986 in Ingham County and became a member of the State Bar of Michigan on November 21, 1986.

*John T. Berry*

John T. Berry  
Executive Director  
January 04, 2006

